Summary of Findings and Conclusion

Unit Name and Number: **WIU #CDCA 124 (Conglomerate Mesa)**

Summary for WIUs #CDCA 124-9, 124-10, 124-11, and 124-12.

Results of Analysis:

1. Do these areas meet the size requirements? No
   WIU #CDCA 124-9, 124-10, 124-11, and 124-12 have been excluded from the eligible areas for not meeting other criteria (see below).

2. Do these areas appear to be natural? No

Conclusion: **WIU #CDCA 124-9, 124-10, 124-11, & 124-12 do not have wilderness characteristics.**

Summary for WIUs #CDCA 124-1, 124-2, 124-3, 124-4, 124-5, 124-6, 124-7, and 124-8.

Results of Analysis:

1. Do these areas meet the size requirements? Yes

2. Do these areas appear to be natural? Yes

3. Do these areas offer outstanding opportunities for solitude or a primitive and unconfined type of recreation? Yes

4. Do these areas have supplemental values? Yes

Conclusion: **WIU #CDCA 124-1, 124-2, 124-3, 124-4, 124-5, 124-6, 124-7, & 124-8 have wilderness characteristics.**

Prepared by:

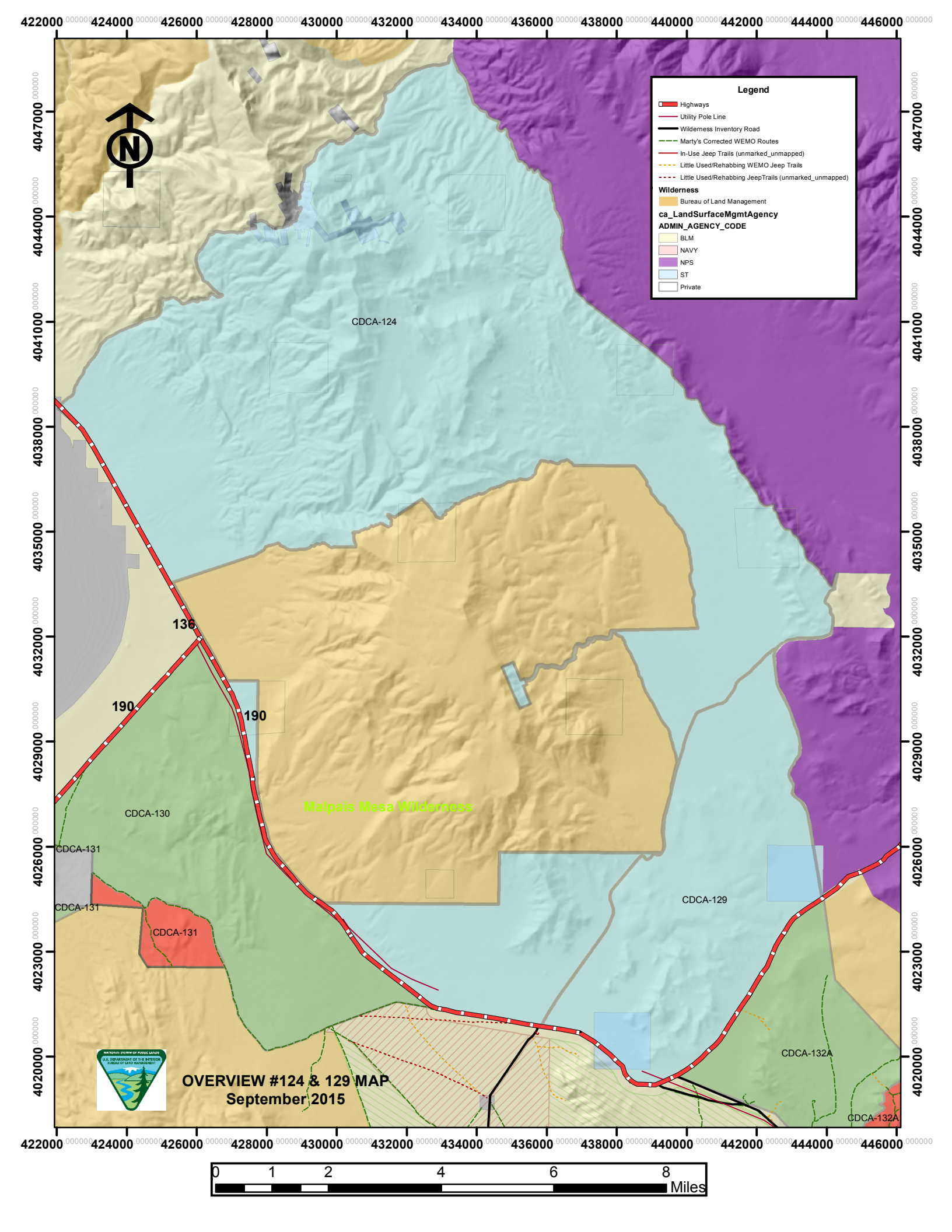
Team Member Marty Dickes, ORP/Wilderness Coordinator, BLM Ridgecrest FO
Date: 2015-04-9-23

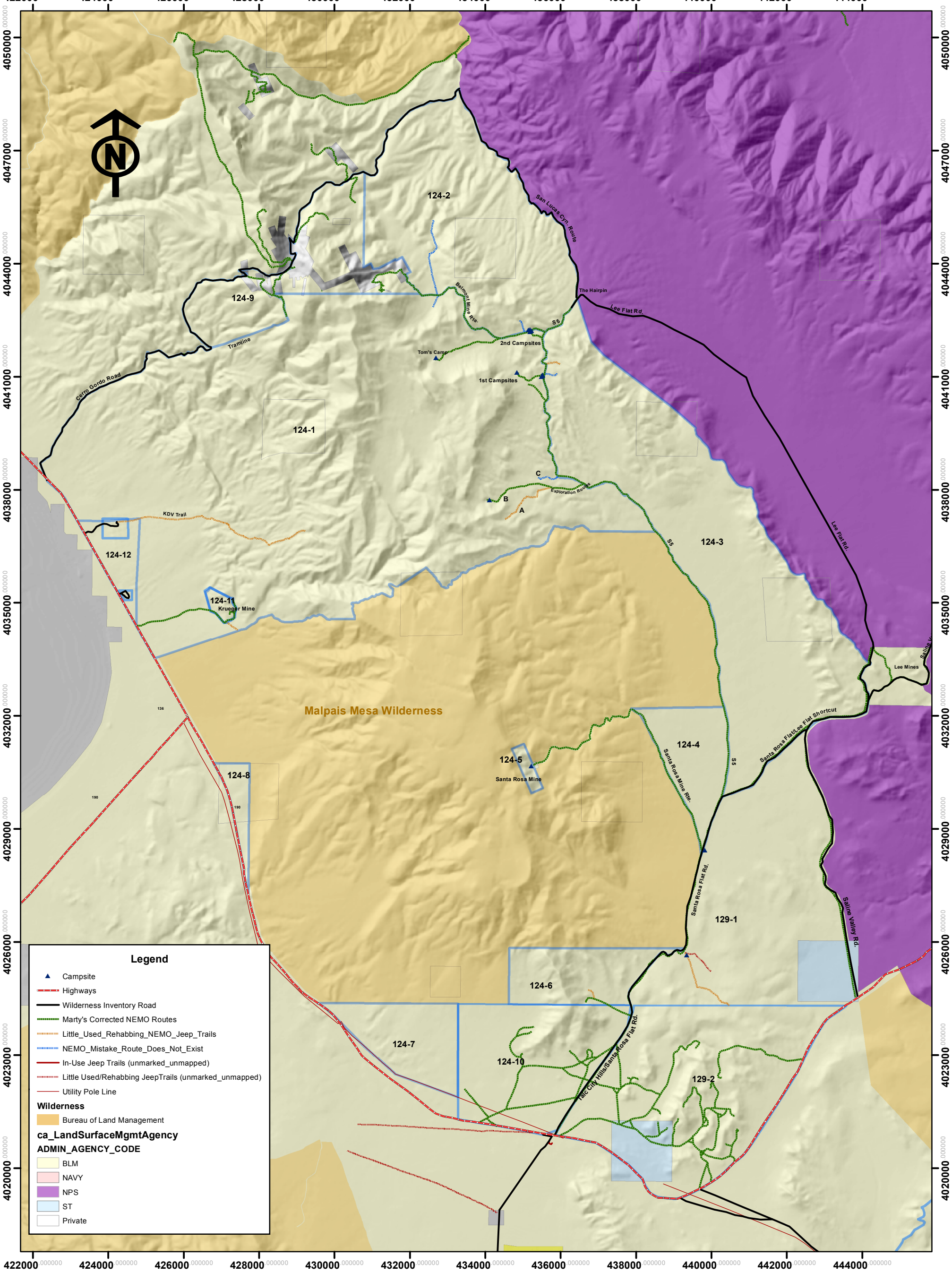
Approved by:

_____ 9/24/2015

Field Manager **Date**

This form documents information that constitutes an inventory finding on wilderness characteristics. It does not represent a formal land use allocation or a final agency decision subject to administrative remedies under either 43 CFR parts 4 or 1610.5-2.


Legend
Highways
Utility Pole Line
Wilderness Inventory Road
Marty's Corrected WEMO Routes
In-Use Jeep Trails (unmarked_unmapped)
Little Used/Rehabbing WEMO Jeep Trails
Little Used/Rehabbing JeepTrails (unmarked_unmapped)
Wilderness
Bureau of Land Management
ca_LandSurfaceMgmtAgency
ADMIN_AGENCY_CODE
BLM
NAVY
NPS
ST
Private
N
CDCA-124
136
190
190
Malpais Mesa Wilderness
CDCA-130
CDCA-131
CDCA-131
CDCA-131
CDCA-129
CDCA-132A
CDCA-132A
OVERVIEW #124 & 129 MAP
September 2015
0 1 2 4 6 8
Miles
422000 424000 426000 428000 430000 432000 434000 436000 438000 440000 442000 444000 446000
4047000 4044000 4041000 4038000 4035000 4032000 4029000 4026000 4023000 4020000



FINAL MASTER APPENDIX C #124 & 129 SUBUNITS
ROUTE ANALYSIS MAP - September 2015

0 1 2 4 6 8 Miles

Year 2015 Inventory Unit Number/Name WIU #CDCA 124 (Conglomerate Mesa)

FORM 1

Documentation of BLM Wilderness Inventory Findings On Record

1. Is there existing BLM wilderness inventory information on all or part of this area?

Yes

Inventory Source: 1979 CDCA Wilderness Inventory Final Descriptive Narratives, BLM Ridgecrest FO

Inventory Unit Name(s)/Number(s): WIU #CDCA 124 (Cerro Gordo Peak)

Map Name(s)/Number(s): USDI BLM CASO Wilderness Final Inventory, March 31, 1979

BLM District(s)/Field Office(s): Ridgecrest Field Office

2. BLM Inventory Findings on Record

Existing inventory information regarding wilderness characteristics:
Inventory Source: 1979 CDCA Wilderness Inventory Final Descriptive Narratives, BLM, Ridgecrest FO

Unit#/ Name	Size (acres)	Natural Condition? Y/N	Outstanding Solitude? Y/N	Outstanding Primitive & Unconfined Recreation? Y/N	Supplemental Values? Y/N
1979 Findings WIU #CDCA 124 (Cerro Gordo Peak)	~60,000 (historic acres)	Y~54,000 N~6,000 acres	Y N	Y N	Y Not Evaluated
2015 Findings WIU #CDCA 124-1	Y ~ 22,500	Y	Y	Y	Y
2015 Findings WIU #CDCA 124-2	Y ~5,632	Y	Y	Y	Y
2015 Findings WIU #CDCA 124-3	Y ~8,963	Y	Y	Y	Y

Unit#/ Name	Size (acres)	Natural Condition? Y/N	Outstanding Solitude? Y/N	Outstanding Primitive & Unconfined Recreation? Y/N	Supplemental Values? Y/N
2015 Findings WIU #CDCA 124-4	Y ~1,236 Contiguous to Existing Wilderness		Y	Y	Y
2015 Findings WIU #CDCA 124-5 (Santa Rosa Mine Wilderness Donation)	Y ~107.5 Contiguous to Existing Wilderness	Y	Y	Y	Y
2015 Findings WIU #CDCA 124-6	Y ~1,327.5 Contiguous to Existing Wilderness	Y	Y	Y	Y
2015 Findings WIU #CDCA 124-7	Y ~1,367 Contiguous to Existing Wilderness	Y	Y	Y	Y
2015 Findings WIU #CDCA 124-8	Y ~322 Contiguous to Existing Wilderness	Y	Y	Y	Y
2015 Findings WIU #CDCA 124-9 (Belmont & Cerro Gordo Patented Claim Blocks)	N ~2,554.5 Non-contiguous acres	N	N	N	Not Evaluated
2015 Findings WIU #CDCA 124-10 (Talc City Hills)	N ~3,015.5 Non-contiguous acres	N	N	N	Not Evaluated
2015 Findings WIU #CDCA 124-11 (Krueger Mine)	N ~108 Non-contiguous acres	N	N	N	Not Evaluated

Unit#/ Name	Size (acres)	Natural Condition? Y/N	Outstanding Solitude? Y/N	Outstanding Primitive & Unconfined Recreation? Y/N	Supplemental Values? Y/N
2015 Findings WIU #CDCA 124-12 (Encompasses both the DWP Gravel Pit & the Caltrans Gravel Pit)	N ~568 Non-contiguous acres	N	N	N	Not Evaluated

Summarize any known primary reasons for prior findings in this table:

The original WIU #CDCA 124 encompassed more than 60,000 acres. It was bordered on the west by Highway 138 (now Highways 136 & 190) and a wooden pole utility line right-of-way, on the north by the Cerro Gordo and Lucas Canyon roads, on the east by the White Mountain Talc Road (now the Talc City Hills Road) and the Saline Valley Road, and on the south by Highway 190. It included the eastern slopes of the Santa Rosa Hills, now part of Death Valley National Park.

The 1979 analysis and decision was that an unspecified number of acres did not meet wilderness criteria because of extensive mining activity. These acres included lands at the northern end of the unit in the vicinity of Cerro Gordo Peak, including patented lands associated with the Cerro Gordo mines and the Sunset, Morning Star, and Belmont Mines. Shafts, tailings, abandoned mining equipment and structures; plus a network of vehicle ways were found to lace the area. Two additional mining areas along the western boundary of the unit off of Highway 136 were also excluded: the large, heavily-disturbed Krueger Mine and a small, historic adit and headframe near the terminus of the KDV jeep trail. Roads and large mining activity sites along the southern boundary associated with the White Swan and Viking mines (part of the Talc City Hills mining complex) were excluded, as was the patented Santa Rosa Mine claim block.

The remainder of the unit was found to be natural and to have superlative wilderness character. The ruggedness of the mountain terrain was found to "localize" mining impacts with respect to the entire roadless area, "resulting in the presence of a large area which retains its primeval character and is subjected primarily to the forces of nature."

The inventory additionally found that:

> "The varied landform and diverse vegetative patterns produce numerous areas of isolation. The network of spaces generated by mountainsides, rock outcrops, depressions, washes, tall creosote, Joshua Trees, Pinyon Pine and Junipers insures outstanding opportunities for solitude. The area also provides users with outstanding areas where unrestricted movement in all directions is possible."

The boundaries of the potential Wilderness Study Area were adjusted accordingly to conform to this truly roadless and undeveloped area.

In 1990, the BLM recommended 0 acres within what became a 54,204 acre WSA for wilderness. Two different suitability recommendations were analyzed: partial wilderness (96% suitable) and no wilderness. The final non-suitable recommendation was based upon a conclusion that the area's mineral potential and opportunities for motorized recreation exceeded the value of the area's wilderness values. Although the area clearly possessed wilderness values sufficient to meet criteria set forth in Section 2(c) of the Wilderness Act, these values were not felt to be distinctive or important enough to override the area's potential for other uses. In addition, the area was thought to offer no outstanding features or single attraction of special significance other than what was typical in the region, to merit its inclusion in the Wilderness Preservation System.

In 1994, the California Desert Protection Act (CDPA) established a 31,960-acre Malpais Mesa Wilderness, and included part of the Santa Rosa Hills (the eastern slopes) in the expansion of Death Valley National Park.

The remaining portions of the original WIU currently under review are south, west and north of the Malpais Mesa Wilderness. These portions have been subsequently subdivided into units that have been found to have or to not have wilderness character. Most of the original areas excluded in the 1979 inventory have been found not to have wilderness character for the reasons previously described. They include the heavily-mined areas around Cerro Gordo (now encompassed within Unit #124-9) and the Talc City Hills (now within #124-10). The Krueger Mine has also been excluded (Unit #124-11) as has the jeep trail accessing it. This mine extends over 108 acres and is full of shafts, adits, prospects, structures, equipment and machinery.

The one small historic adit with a headframe near the terminus of the KDV jeep trail (synonymous with the original Keeler to Death Valley stock and foot trail), however, has not been excluded from eligible areas in this updated inventory. It has been found to have wilderness character and it remains part of eligible Unit #124-1, as does the difficult, steep, deteriorating KDV jeep trail accessing it. The mine is a very small, discreet, historic site near the jeep trail's terminus. The jeep trail's terminus is near the start of a long series of switchbacks comprising the original stock and foot trail from Keeler to Death Valley. This trail can still be followed on foot up and over Conglomerate Mesa, across the Santa Rosa Hills and Lee Flat, down to Saline Valley and up to the Lippincott Mine and beyond.

Also no longer excluded is the Santa Rosa Mine patented claim block which was donated in 1999 by the heir (son) of the patent holder to BLM for inclusion in the Malpais Mesa Wilderness under Section 6(a). The claim block is currently unclassified and as such, has been withdrawn from new mineral entry. However, BLM still has not followed-through with the appropriate Congressional process to get it reclassified as wilderness.

The Santa Rosa Mine was a lead/silver producer. The mine dates back to 1912 and was last worked in the 1950's. In its heyday, it was eighth largest lead producer in the State of California. The mine's main adit collapsed shortly after the property was donated. The mine shaft goes back into the mountain approximately 1,500 feet. The mine workings it encases are reportedly essentially intact. Today, the only visible developments left on-site are the timbers constructed at the entrance of the mine and an old bunkhouse foundation. To the right is a trail or small dirt road which takes you pass the bunkhouse foundation. The dirt trail follows a ravine up and around another hill to several other old mining claims. One can follow the trail or small dirt road (closed at the claim block/wilderness boundary) around the mine site to the very top of Malpais Mesa. The Santa Rosa Mine jeep trail is cherry-stemmed out of wilderness. It has been excluded in this inventory from the adjacent eligible Unit #124-4, where it defines the unit's western boundary, to maintain access to the mine site. The Santa Rosa Mine would now make an excellent trailhead to the Malpais Mesa Wilderness.

Since the last inventory, two new gravel pits have been authorized and are currently operating. They include a small 10-acre plus/minus pit operated by Caltrans for highway maintenance and a much larger gravel pit operated by LADWP for dust abatement on Owens Lake. These areas are both contained within Unit #124-12, which has been enlarged beyond the current disturbance footprints and permit areas to allow for expansion in the future.

The recent inventory (2015) found approximately 22,500 acres (also contiguous to the Malpais Mesa Wilderness) in subunit 124-1; approximately 5,632 acres in subunit 124-2; approximately 8,963 acres in subunit 124-3; approximately 1,236 acres contiguous to the Malpais Mesa Wilderness in subunit 124-4; approximately 107.5 contiguous acres in subunit 124-5; approximately 1,327.5 contiguous acres in subunit 124-6; approximately 1,367 contiguous acres in subunit 124-7; and approximately 322 contiguous acres in 124-8, to <u>have</u> <u>wilderness</u> <u>character</u>.

The recent inventory (2015) found approximately 2,554.5 acres, approximately 3,015.5 acres, approximately 108 acres, and approximately 568 acres, in subunits 124-9 (Cerro Gordo), 124-10 (Talc City Hills), 124-11 (Krueger Mine), and 124-12 (DWP & Caltrans Gravel Pits) respectively, <u>not</u> <u>to</u> <u>have</u> <u>wilderness</u> <u>character</u>.

FORM 2

Documentation Of Current Wilderness Inventory Conditions

Unit Numbers/Names **WIU #CDCA 124-1, 124-2, 124-3, 124-4, 124-5, 124-6, 124-7, and 124-8.**

(1) Sufficient size

Yes. **Acreage:**

22,500 acres	also contiguous to wilderness in #CDCA 124-1.
5,632 acres	in #CDCA 124-2.
8,963 acres	in #CDCA 124-3.
1,236 acres	contiguous to wilderness in #CDCA 124-4.
107.5 acres	contiguous to wilderness in #CDCA 124-5.
1,327 acres	contiguous to wilderness in #CDCA 124-6.
1,367 acres	contiguous to wilderness in #CDCA 124-7.
322 acres	contiguous to wilderness in #CDCA 124-8.

All on BLM land as calculated by GIS Measuring Tool in 2015.

Boundary revision: Boundaries have been redrawn to reflect 1994 wilderness and park designations in the area. Boundaries have also been redrawn to exclude all wilderness inventory roads within the original unit, as well as the S5 jeep trail, the primary north-south transportation route through Santa Rosa Flat, and the Belmont Mine jeep trail, the primary access route to patented mining claims in the northern part of the unit.

Boundaries:

#CDCA 124-1: The western boundary follows the Highway 136 ROW, excluding two permitted gravel pits and the mining disturbance at the Krueger Mine. The northern boundary follows along the southside of the Cerro Gordo Road to a tramline, continuing on the southside of the tramline to a jeep trail servicing the tramline. It then follows east of the jeep trail north to a east-west section line near the bottom of the patented mining claims which it follows east across two sections to exclude the patented claim block to the Belmont Mine jeep trail. It then follows the Belmont Mine jeep trail down its west side to an intersection with the S5 jeep trail. The eastern boundary stays on the west side of the S5 jeep trail following it south to the northern boundary of the Malpais Mesa Wilderness. The southern boundary is contiguous with the northern boundary of the wilderness area.

#CDCA 124-2: The western boundary follows along the east side of the Belmont Mine jeep trail to a north-south section line east of the patented claim block. It

follows the section line north to the back (east) side of the Cerro Gordo Road. The northern boundary runs along the southside of the back side of the Cerro Gordo Road to its intersection with the San Lucas Canyon Road. The eastern boundary continues south along the western side of the San Lucas Canyon Road to its intersection with the S5 jeep trail. The southern boundary continues on the northside of S5 to its intersection with the Belmont Mine jeep trail.

#CDCA 124-3: The western boundary runs north along the east side of the S5 jeep trail to its intersection with the Death Valley National Park boundary near the intersection of S5 and the San Lucas Canyon/Lee Flat Roads. The eastern boundary follows the BLM/DVNP boundary along the crest of the Santa Rosa Hills to their intersection with the Lee Flat Road. The southern boundary follows west of the Lee Flat Road to its intersection with the Santa Rosa Flat Shortcut Road to Lee Flat. It then continues north of the Shortcut Road to its intersection with the S5 jeep trail.

#CDCA 124-4: The western boundary runs north along the east side of the Santa Rosa Mine cherry-stemmed jeep trail, excluding the jeep trail and cherrystem from this eligible unit, to its intersection with the Malpais Mesa Wilderness boundary. The northern boundary follows the wilderness boundary east to the S5 jeep trail. The eastern & southern boundary follows south along the west side of the S5 jeep trail back to its intersection with the Santa Rosa Mine jeep trail.

#CDCA 124-5: Santa Rosa Mine Claim Block. The boundaries are contiguous with the Malpais Mesa Wilderness boundaries around the old patented claim block.

#CDCA 124-6: The western and northern boundaries follow the Malpais Mesa Wilderness boundaries. The eastern boundary follows along west of the Talc City Hills/Santa Rosa Flat Road. The southern boundary follows a section line east from a point near BM 4923.2 as shown on the Talc City Hills 7 ½ minute topographic map, in line with the southern boundary of the Malpais Mesa Wilderness area.

#CDCA 124-7: The western boundary is east of the utility line and Highway 190 ROW. The northern boundary is the Malpais Mesa Wilderness boundary. The eastern boundary is a section line dividing the natural area from the old mining disturbances associated with the western end of the Talc City Hills.

#CDCA 124-8: The western boundary is east of the Highway 190 ROW. The northern and eastern boundaries are the Malpais Mesa Wilderness Area. This fills out a small triangle mistakenly excluded from the wilderness area because it was originally attached to WIU #130 which is located across the highway to the west.

Description of Current Conditions

Land ownership: BLM (22,500 acres; 5,632 acres; 8,963 acres; 1,236 acres; 107.5 acres; 1,327 acres; 1,367 acres; and 322 acres, for Units #124-1, 124-2, 124-3, 124-4, 124-5, 124-6, 124-7, and 124-8 respectively); private inholdings (0 acres).

Location: 7-20 miles north and northwest of the community of Darwin, T18, 17, &16S, R38, 39 & 40E, and 25 miles south and east of Lone Pine, CA.

Topography: The area encloses the southern end of the Inyo Mountains, the west side of the Santa Rosa Hills, and Santa Rosa Flats. These combine to provide a multitude of transitional areas and a constantly changing landscape. Generally, the southwestern portions are formed by bajadas which rise to meet the rugged volcanic lava flow known as Malpais Mesa and the steep escarpment of Conglomerate Mesa. The areas at the southern end are flat, rising to low rolling hills and the lava flow. In the northern and eastern sections of the area, the transition to the Inyo Mountains is made by gradual landform changes from volcanic (Malpais Mesa) to coarse conglomerate (Conglomerate Mesa), and from relatively flat terrain (Santa Rosa Flat) to the more hilly and mountainous areas between the Santa Rosa Hills and the two mesas, and on up into the Inyos themselves. Rugged valleys, deep canyons, sheer mountain sides, meadows, and high mesas can all be found within a short distance of each other.

Vegetation features: Plant life is as varied as the landforms. On the western side near Owens Lake, vegetation is extremely sparse. Creosote, supported by low desert shrubs and grasses dominate the bajadas. The transition from desert creosote to mountain Pinyon Pine and Juniper is unique. This change continues over the crest and down the eastern slope, where large stands of Joshua trees provide the transition back to a desert environment.

Major human uses/activities: 4WD touring and hiking to see scenery and explore the backcountry. Some deer hunting in the Fall.

(2) Natural condition

Yes. WIU #124-1 may not be the largest roadless area left in the Ridgecrest Field Office (that area would be WIU #142, encompassing both the Slate Range and Southern Panamint Valley), but it is undoubtedly the largest area left within the Field Office which is nearly completely free of vehicle use, vehicle use trails, and associated impacts. Less than 10 miles of jeep trails and verified GTLF features intrude into this 22,500-acre area. The three most popular jeep trails with multiple campsites keep to within a half-mile of the eastern boundary of the unit. Two more infrequently used trails along this same boundary extend for less than a mile-and-a-half to solitary campsites. Along the western boundary of the unit, one seldom used, very rough jeep trail extends into the area for about a mile-and-a-half from Highway 136 to the Krueger Mine, a heavily-disturbed (excluded) area. The longest of the jeep trails, the KDV trail, extending 3 miles

into the unit, is in very poor condition, is very lightly used, and is unable to accommodate more than 1-2 vehicles at a time at its terminus. The start of this trail is also obscured by the new DWP gravel pit which blocks its visible access from the highway. Other GTLF features located within the unit can be characterized as little to never used, rehabbing routes, or plain NEMO mistakes, i.e., as routes that don't actually exist on the ground.

The rehabilitated Timberline, Inc. Exploration route has recovered quite well. See photos 0666-0789 (taken by Marty Dickes) and additional photos taken by Shelley Ellis on the same field trip on May 9th of last year (2014). Most of the constructed road is now sparsely vegetated and the slope has been successfully backfilled and re-contoured to match its surroundings. From a distance, the old roadbed looks more like strata than a constructed feature. It will improve with time as long as it remains undisturbed.

All of the other smaller eligible units, WIU #s 124-2, 124-3, 124-4, 124-5, 124-6, 124-7, and 124-8 are virtually free of vehicle routes and GTLF features altogether. The two routes shown intruding into 124-2 no longer exist; the longest of them is estimated to be about 80% rehabbed. Only one of the two routes shown intruding into 124-3 is still in-use. It is a lightly used spur extending less than 0.3 of a mile to a low saddle with no campsite. The jeep trail to an old mine/prospect extends into Unit 124-6 for about 0.3 mile. The prospect is readily visible from the Talc City Hills/Santa Rosa Flat Road and may attract as many as 25 visitors/year. The developments at the site are very small and discrete, consisting of one headframe over a vertical shaft, a small dump, and a few additional holes dug into the hillside. The short branching spur route from the mine/prospect over to the edge of the drainage looks like it may attract less than half the amount of use that the mine/prospect itself attracts.

Units 124-4, 124-5, 124-7, and 124-8 have no jeep trails and no GTLF features whatsoever.

(See Appendix C – Route Analysis maps.)

(3) Outstanding opportunities for solitude

Yes. As pointed out in the original 1979 inventory for the area: the varied landforms and diverse vegetation provide many areas where screening is available for isolation and solitude: "The network of spaces generated by mountainsides, rock outcrops, depressions, washes, tall creosotes, Joshua trees, pinyon pines, and junipers insures outstanding opportunities for solitude." The sheer size, breadth and extent, and remoteness of the area also helps enormously in this regard, as does the relatively low visitor use levels, which plumet with distance from the available route network.

(4) Outstanding opportunities for primitive and unconfined recreation

Yes. In many places, the terrain is not so formidable that it cannot be explored rather easily on foot, and in some places, perhaps too on horseback. There are many outstanding areas where unrestricted movement in all directions is possible.

In addition, the KDV trail offers an unparalled opportunity to climb up the west side of Conglomerate Mesa, where the terrain is quite steep and difficult, to cross over the top of the mesa, and to descend down the mesa on the east side. This trail is in-use by hikers and backpackers. Most people climb up to the top of the mesa via this trail on the east side. Some, most notably Desert Survivors, have used the trail climbing up on the west side to backpack from Keeler to Bullfrog.

The west side KDV jeep trail following the old stock route to the historic mine is in very poor condition. The start of the historic stock route near the terminus of this jeep trail is not well-defined. For now, it is probably best to leave it undefined until the area can be inventoried for cultural resources and sensitive sites along the way can be recorded. In the interim, it would be better to terminate the jeep trail short of its present terminus. Keep it open to where it is still in relatively good condition and where a better turnaround and parking area can be located. The present route gets very steep and difficult at the top. The current turnaround is very small and tight, stopping abruptly along a steep ridgeline flanked by stegosaurus-like fins of upended slabs of slate.

(5) Supplemental values

Yes.

Plants: The area has a unique assemblage of plant communities since it lies at the eastern edge of the Mojave Desert and the western edge of the Great Basin. It supports creosote scrub and silver cholla, Joshua tree and pinyon-juniper woodlands, as well as sagebrush ecosystems. The area is known to contain many unique and sensitive plant species, such as Ripley's Cymopterus (*Cymopterus ripleyi var. saniculoides*) and Inyo rock daisy (*Perityle inyoensis*). Michele Slaton, a botanist, formerly with Death Valley National Park, now with Inyo National Forest, reported finding *Perityle inyoensis* and *Haplopappus nana* (Dwarf goldenbush) in May of 2011 on Conglomerate Mesa (per personal email). Another species of concern, Mojave fish-hook cactus (*Sclerocactus polyancisterus*) is also known to occur here. *Purshia Mexicana var. dubia*, a species of special interest, was identified and photographed by Shelley Ellis along the rehabbed exploration route in May of 2014. It is probable that more sensitive species exist here since few surveys have been conducted.

Wildlife: The area supports a variety of lizards, snakes, and small mammals, both rodents and lagomorphs. Mohave ground squirrels have been reported within the southern part of the unit. Small wildlife supports many predators, including raptors, badgers, bobcats, foxes, and coyotes. Raptors most likely to inhabit the area include Golden Eagle (*Aquila chrysaetos*), Cooper's Hawk (*Accipiter cooperii*), Prairie falcon (*Falco mexicanus*), Sharp-shinned Hawk (*Accipiter striatus*), and various owl species. Old prospects, shafts, and adits provide roosts for many sensitive bat species, including Townsends Western big-eared bat (*Plecotus townsendii*).

Other BLM sensitive species occurring in the area include: Northern Sagebrush Lizard (*Sceloporus graciosus graciosus*), Burrowing Owl (*Athene cunicularia*), and Northern goshawk (*Accipiter gentilis*). Le Conte's Thrasher (*Toxostoma lecontei*), a State Species of Special Concern, can be found here. Upland areas, particularly in the northern part of the unit, provide

important winter Mule deer habitat and overwintering sites and transportation corridors for Nelson's Bighorn Sheep (*Ovis Canadensis nelson*i), a BLM Sensitive Species. Larger prey species support mountain lion.

Cultural Resources: A portion of this unit is located within the Cerro Gordo Area of Critical Environmental Concern (ACEC). This ACEC was designated in the CDCA Plan of 1980 to "provide protection to cultural resources and rare plant species and habitat." (Management Plan for the Cerro Gordo ACEC, CA-06-ACEC-05, 1990) The primary focus of the plan was on historic era mining sites with the historic period of significance identified with the silver boom in Cerro Gordo from 1865-1890. This ACEC has been proposed for expansion under the Desert Renewable Energy Conservation Plan amendment to the CDCA that is currently underway. The proposed expansion would put significantly more of the unit, specifically the top and flanks of Conglomerate Mesa, into the ACEC. Ashley Blythe, Ridgecrest BLM Archeologist has provided the following rationale for the ACEC's expansion into Conglomerate Mesa:

"Conglomerate Mesa in the southern Inyo Mountains has a unique collection of historic era mining features, particularly associated with early charcoal production for Cerro Gordo and smelters in the Owens Valley. Because of the inaccessibility of the mesa and limited-to-no off-highway vehicle use of the area, these sites, dated to 1868, are in excellent, undisturbed condition. The area is also identified in the ethnographic literature as being a traditional pinyon nut gathering location; this is evidenced by the presence of brush structures, lithic materials, and ceramics, dating to the contact period in the Owens Valley and earlier. The mining history of this area details battles between native groups and charcoal burners, who were competing for the pinyon resources in this area."

Tom Budlong, an Archeological Site Steward with the BLM, who has been helping locate and record sites in the area, describes the 20 or more early charcoal manufacturing sites found in the area as follows:

"Almost universally, the sites have a 'stacked rock structure' serving as a fireplace. Quality varies from well-constructed to a crude fire ring. All have a 'charcoal pit' nearby. These are dark brown to black, from charcoal bits and powder that would have been uneconomical to transport to Cerro Gordo. Perimeters of many pits have logs with one end burned and a shallow ditch – the source of dirt to control the fire coverting the wood to charcoal. Commonly the actual burn location has sparse or no vegetation, the soil having been sterilized by the heat of the fire. All locations have a field of pinon stumps from trees. Some stumps have toppled from root rot. Others are standing and sturdy. One burn pile remains unburnt, brown from weathering. Complete lack of charcoal kilns, a much more efficient method of converting wood to charcoal, is evidence of insufficient 'capital' and organization. All burning was open-air, smothered at the right time in the burning process."